REPORTS ANALYSIS REFERRAL

OT

OFFICE OF GENERAL COUNSEL

DATE:

June 5, 2008

ANALYST: Corbin T. Jones

I. COMMITTEES:

IA-01 Congressional Victory Committee

C00413013

Christopher J. Ward, Treasurer

P.O. Box 40177

Washington, DC 20016

MN-06 Congressional Victory Committee

C00421636

Christopher J. Ward, Treasurer

P.O. Box 40177

Washington, DC 20016

NY-24 Congressional Victory Committee

C00423525

Christopher J. Ward, Treasurer

P.O. Box 40177

Washington, DC 20016

II. RELEVANT STATUTE:

2 U.S.C. §441a(a)(1)(A)

11 C.F.R. §110.1(b)

III. BACKGROUND:

Apparent Excessive Contributions Made to Federal Candidates; Other Violations of the Federal Election Campaign Act

During the 2006 calendar year, IA-01 Congressional Victory Committee (IA-01 CVC), MN-06 Congressional Victory Committee (MN-06 CVC) and NY-24 Congressional Victory Committee (NY-24 CVC) disclosed apparent excessive contributions made to federal candidate

committees totaling \$166,900.00, \$131,900.00 and \$107,400.00, respectively (Attachment 2). Transfers totaling \$109,500.00 reported by NY-24 CVC never appeared on the federal candidate committee's filed reports.

IA-01 Congressional Victory Committee

On June 19, 2006, Whalen for Congress filed an amended Statement of Organization (FEC FORM 1) disclosing IA-01 CVC as an "Affiliated Committee" (Image 26930275209), and an amended Statement of Candidacy (FEC FORM 2) disclosing IA-01 CVC as a committee authorized by the candidate (Image 26960243174).²

On June 15, 2006, Whalen for Congress filed a 2006 July Quarterly Report covering the period from May 18 through June 30, 2006. Schedule A supporting Line 12 (Transfers from Other Authorized Committees) disclosed two (2) receipts from "IA-01 Congressional Victory Committee," \$36,500.00 on June 27, 2006, notated as a "Transfer from Affiliated Committee," and \$16,500.00 on June 30, 2006, notated as a "Check" (Images 26950261905-930). Schedule A supporting Line 12 also disclosed memo entries for contributions requiring itemization totaling \$33,503.13 (without an indication of which memo entries pertained to the \$36,500.00 and which to the \$16,500.00 transfer)³.

On June 27, 2006, IA-01 CVC filed an amended FEC FORM 1. On Line 6 (Name of Any Connected Organization or Affiliated Committee) IA-01 CVC disclosed "Whalen for Congress" with a relationship of "Affiliated Ctte" (Image 26940215076).

On July 11, 2006, IA-01 CVC filed a 2006 July Quarterly Report covering the period from May 18 through June 30, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed two (2) contributions to "Whalen for Congress" totaling \$53,000.00, \$36,500.00 on June 27, 2006 and \$16,500.00 on June 30, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26930209190).

On October 11, 2006, IA-01 CVC filed a 2006 October Quarterly Report covering the period from July 1 through September 30, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed an \$8,700.00 contribution to "Whalen for Congress" on September 8, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26950541110).

¹ IL-08 Congressional Victory Committee and CA-50 Congressional Victory Committee, operated by the same treasurer as IA-01 CVC, MN-06 CVC, and NY-24 CVC, also reported apparent excessive contributions to federal candidate committees. The total apparent excessive contributions equaled \$63,300.00 and \$63,900.00, respectively. These two committees were not sent RFAIs and have since terminated registration with the Federal Election Commission.

² Whalen for Congress did not disclose IA-01 CVC on any of its prior FEC FORM 1s or FEC FORM 2s.

³ On September 29, 2006, Whalen for Congress filed an amended 2006 July Quarterly Report with no change in the amounts of transfers from IA-01 CVC; however, memo entries for contributions requiring itemization now totaled \$43,244.13 (Images 26940367910-935).

⁴ IA-01 CVC did not disclose Whalen for Congress on any of its prior PBC FORM 1s.

the treasurer's receipt. In addition, the RFAI informed IA-01 CVC of the requirement to file FEC FORM 1M "Notification of Multicandidate Status" within 10 days of meeting the multicandidate committee criteria (Images 27039432110, 27039432106, and 27039432102).

On May 4, 2007, an RFAI was sent to IA-01 CVC referencing the 2006 30 Day Post-General Report. The RFAI sought clarification regarding a contribution to "Whalen for Congress" that appeared to be in excess of the \$2,100.00 per candidate per election limit for a non-multicandidate committee and informed IA-01 CVC that it may need to request a refund of any excessive contributions made. The RFAI further stated that IA-01 CVC could request a portion of the contribution be redesignated if done within 60 days of the treasurer's receipt. In addition, the RFAI informed IA-01 CVC of the requirement to file FEC FORM 1M "Notification of Multicandidate Status" within 10 days of meeting the multicandidate committee criteria (Image 27039435037).

On May 22, 2007, IA-01 CVC submitted four (4) Miscellaneous Electronic Submissions (FEC FORM 99) referencing the 2006 July Quarterly Report, 2006 October Quarterly Report, 2006 12 Day Pre-General Report and 2006 30 Day Post-General Report, respectively, which stated in part, "In response to your letter... please note that the Committee is affiliated with Whalen for Congress and made transfers to an affiliated committee. The committee did not make any candidate contributions. The committee followed FEC AO 1977-16 to set up and operate the Committee" (Images 27990109000, 27930742797, 27990109001 and 27930742798).

To date, no further communication has been received from IA-01 CVC regarding this matter.

MN-06 Congressional Victory Committee

On October 26, 2006, MN-06 CVC filed a 2006 12 Day Pre-General Report covering the period from October 1 through October 18, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed a \$115,000.00 contribution to "Bachmann for Congress" on October 18, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26940562832).

Also on October 26, 2006, the Bachmann for Congress committee filed an amended FEC FORM 1 disclosing MN-06 CVC as an "Affiliated Committee" (Image 26039251322) and an amended FEC FORM 2 disclosing MN-06 CVC as a committee authorized by the candidate (Image 26039251319).

Backmann for Congress did not disclose MN-06 CVC on any of its prior FEC FORM 1s or FEC FORM 2s.

⁸ FEC AO 1977-16 indicates that a Committee may voluntarily restrict itself to the contribution limits of a principal campaign committee (PCC) of a candidate and later become a PCC of a candidate. The AO states, "... an actual transfer of funds is not anticipated. Rather by designating the Committee as his or her PCC, the selected candidate will assume constructive control over the funds and they will be combined with any contributions which were received by or on behalf of the candidate before his or her selection by the Committee." In this situation, a PCC was already in existence for Whalen for Congress at the time IA-01 CVC registered.

On November 8, 2006, an RFAI was sent to MN-06 CVC referencing the 2006 12 Day Pre-General Report. The RFAI sought clarification regarding a contribution to "Bachmann for Congress" that appeared to be in excess of the \$2,100.00 per candidate per election limit for a non-multicandidate committee and informed MN-06 CVC that it may need to request a refund of any excessive contributions made. The RFAI further stated that MN-06 CVC could request a portion of the contribution be redesignated if done within 60 days of the treasurer's receipt. In addition, the RFAI informed MN-06 CVC of the requirement to file FEC FORM 1M "Notification of Multicandidate Status" within 10 days of meeting the multicandidate committee criteria (Image 26039271113).

On November 14, 2006, MN-06 CVC filed an amended FEC FORM 1. On Line 6 (Name of Any Connected Organization or Affiliated Committee) MN-06 CVC disclosed "Bachmann for Congress" with a relationship of "Affiliated Ctte" (Image 26960667928). 10

On December 6, 2006, MN-06 CVC filed an amended 2006 30 Day Post-General Report covering the period from October 19 through November 27, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed a \$19,000.00 contribution to "Bachmann for Congress" on November 6, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26930599057).

On December 15, 2006, Bachmann for Congress filed a 2006 30-Day Post-General Report covering the period from October 19, 2006 through November 27, 2006. Schedule A supporting Line 12 (Transfers from Other Authorized Committees) disclosed two (2) transfers received from "MN-06 Congressional Victory Committee," \$115,000.00 on October 20, 2006 and \$19,000.00 on November 6, 2006 (Images 26940917867-918). Schedule A supporting Line 12 also disclosed memo entries for contributions requiring itemization that made up the \$115,000.00 transfer, totaling \$113,273.09, as well as the contributions that made up the \$19,000.00 transfer, totaling \$22,789.04¹¹.

On April 20, 2007, an RFAI was sent to MN-06 CVC referencing the 2006 30 Day Post-General Report. The RFAI sought clarification regarding contributions to "Bachman for Congress" that appeared to be in excess of the \$2,100.00 per candidate per election limit for a non-multicandidate committee and informed MN-06 CVC that it may need to request a refund of any excessive contributions made. The RFAI further stated that MN-06 CVC could request a portion of the contributions be redesignated if done within 60 days of the treasurer's receipt. In addition, the RFAI informed MN-06 CVC of the requirement to file FEC FORM 1M "Notification of Multicandidate Status" within 10 days of meeting the multicandidate committee criteria (Image 27039430904).

On May 22, 2007, MN-06 CVC submitted an FEC FORM 99 referencing the 2006 30 Day Post-General Report, which stated in part, "In response to your letter... please note that the

¹⁰ MN-06 CVC did not disclose Bachmann for Congress on any of its prior FEC FORM 1s.

¹¹ The report indicated that one of the individual contributions itemized in a memo entry, totaling \$2,916.67, was refunded.

On October 15, 2006, Whalen for Congress filed a 2006 October Quarterly Report covering the period from July 1 through September 30, 2006. Schedule A supporting Line 12 (Transfers from Other Authorized Committees) disclosed an \$8,700.00 transfer from "IA-01 Congressional Victory Committee" on October 15, 2006, notated as a "Transfer from Joint Committee." Schedule A supporting Line 12 also disclosed memo entries for contributions requiring itemization totaling \$10,000.00. (Images 26950580135-137)

On October 26, 2006, IA-01 CVC filed a 2006 12 Day Pre-General Report covering the period from October 1 through October 18, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed a \$89,500.00 contribution to "Whalen for Congress" on October 18, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26930548034).

Also on October 26, 2006, Whalen for Congress filed a 2006 12 Day Pre-General Report covering the period from October 1 through October 18, 2006. Schedule A supporting Line 12 (Transfers from Other Authorized Committees) disclosed an \$89,500.00 transfer from "IA-01 Congressional Victory Committee" on October 18, 2006, notated as a "Check" (Image 26940560814).

On December 6, 2006, IA-01 CVC filed a 2006 30 Day Post-General Report covering the period from October 19 through November 27, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed a \$17,800.00 contribution to "Whalen for Congress" on November 6, 2006, with the purpose "Transfer to Affiliated Committee" (Image 26930599071).

Also on December 6, 2006, Whalen for Congress filed a 2006 30 Day Post-General Report covering the period from October 19 through November 27, 2006. Schedule A supporting Line 12 (Transfers from Other Authorized Committees) disclosed a \$17,800.00 transfer from "IA-01 Congressional Victory Committee" on November 7, 2006, notated as a "Check" (Image 26940636150).

On April 25, 2007, three (3) Requests for Additional Information (RFAI) were sent to IA-01 CVC referencing the 2006 July Quarterly, 2006 October Quarterly, and 2006 12 Day Pre-General Reports, respectively. Among other matters, the RFAIs sought clarification regarding contributions to "Whalen for Congress" that appeared to be in excess of the \$2,100.00 per candidate per election limit for a non-multicandidate committee and informed IA-01 CVC that it may need to request a refund of any excessive contributions made. The RFAI further stated that IA-01 CVC could request a portion of the contributions be redesignated if done within 60 days of

Only the RFAI referencing the 2006 July Quarterly Report contained other matters.

⁵ No memo entries were itemized in connection with the transfer; however, an amended 2006 12 Day Pre-Primary Report filed on January 19, 2007 itemized \$97,886.75 in memo entries relating to this transfer.

⁴ No memo entries were itemized in connection with the transfer; however, an amended 2006 30 Day Post-Primary Report filed on January 19, 2007 itemized \$19,872.37 in memo entries relating to this transfer.

Committee is affiliated with Bachmann for Congress and made transfers to an affiliated committee. The committee did not make any candidate contributions. The committee followed FEC AO 1977-16 to set up and operate the Committee¹² (Images 27930742718).

To date, no further communication has been received from MN-06 CVC regarding this matter.

NY-24 Congressional Victory Committee

On October 11, 2006, NY-24 CVC filed an amended FEC FORM 1. On Line 6 (Name of Any Connected Organization or Affiliated Committee) NY-24 CVC indicated "Ray Meier for Congress Committee" with the relationship "Affiliated Committee" (Image 26930425550).¹³

On October 13, 2006, Ray Meier for Congress Committee filed an amended FEC FORM 1 disclosing NY-24 CVC in the connected organization/affiliated committee section with the relationship "Joint Fund Raising" (Image 26960497091). On October 15, 2006, Ray Meier for Congress Committee filed an amended FEC FORM 2 disclosing NY-24 CVC as an authorized committee of the candidate (Image 26930451245).¹⁴

On October 26, 2006, NY-24 CVC filed a 2006 12 Day Pre-General Report covering the period from October 1 through October 18, 2006. Schedule B supporting Line 22 (Transfers from Affiliated/Other Party Committees) disclosed a \$92,500.00 contribution to "Ray Meier for Congress Committee" on October 18, 2006 with the purpose "Transfer to Affiliated Committee" (Image 26930548041).

On December 6, 2006, NY-24 CVC filed a 2006 30 Day Post-General Report covering the period from October 19 through November 27, 2006. The report disclosed a \$17,000.00 contribution to "Ray Meier for Congress Committee" on November 6, 2006 with the purpose "Transfer to Affiliated Committee" (Image 26930599064).

Ray Meier for Congress Committee filed the original and several amended 2006 12 Day Pre-General and 30 Day Post-General Reports between October 25, 2006 and August 24, 2007. None of these reports disclosed any receipts from NY-24 CVC.

On April 20, 2007, two (2) Requests for Additional Information (RFAI) were sent to NY-24 CVC referencing the 2006 12 Day Pre-General and 2006 30 Day Post-General Reports. The RFAI sought clarification regarding contributions to "Ray Meier for Congress Committee" that

¹² FEC AO 1977-16 indicates that a Committee may voluntarily restrict itself to the contribution limits of a principal campaign committee ("PCC") of a candidate and later become a PPC of a candidate. The AO states, "... an actual transfer of funds is not anticipated. Rather by designating the Committee as his or her PPC, the selected candidate will assume constructive control over the funds and they will be combined with any contributions which were received by or on behalf of the candidate before his or her selection by the Committee." In this situation, a PCC was already in existence for Bachman for Congress at the time MN-06 CVC registered.

¹³ NY-24 CVC did not disclose Ray Meier for Congress Committee on any of its prior FEC FORM 1s.

14 Ray Meier for Congress Committee did not disclose NY-24 CVC on any of its prior FEC FORM 1s or FEC FORM 2s.

appeared to be in excess of the \$2,100.00 per candidate per election limit for a non-multicandidate committee and informed NY-24 CVC that it may need to request a refund of any excessive contributions made. The RFAI further stated that NY-24 CVC could request a portion of the contributions be redesignated if done within 60 days of the treasurer's receipt. In addition, the RFAI informed NY-24 CVC of the requirement to file FEC FORM 1M "Notification of Multicandidate Status" within 10 days of meeting the multicandidate committee criteria (Images 27039430845 and 27039430848).

On May 22, 2007, NY-24 CVC submitted an FEC FORM 99 referencing the 2006 12 Day Pre-General and 2006 30 Day Post-General Reports, which stated in part, "In response to your letter... please note that the Committee is affiliated with Ray Meier for Congress and made transfers to an affiliated committee. The committee did not make any candidate contributions. The committee followed FEC AO 1977-16 to set up and operate the Committee 15" (Image 27930742717).

On May 31, 2007, the RAD Analyst left a message for the Treasurer, Christopher Ward, indicating the need to discuss, among other issues, the apparent excessive contributions on the 2006 12 Day Pre-General and 30 Day Post-General Reports. The analyst indicated that these matters could be referred to the Office of General Counsel (OGC) (Attachment 3).

To date, no further communication has been received from NY-24 CVC regarding this matter.

¹⁵ FEC AO 1977-16 indicates that a Committee may voluntarily restrict itself to the contribution limits of a principal campaign committee ("PCC) of a candidate and later become a PCC of a candidate. The AO states, "... an actual transfer of funds is not anticipated. Rather by designating the Committee as his or her PCC, the selected candidate will assume constructive control over the funds and they will be combined with any contributions which were received by or on behalf of the candidate before his or her selection by the Committee." In this situation, a PCC was already in existence for Ray Meier for Congress at the time NY-24 CVC registered.

NY-24 CONGRESSIONAL VICTORY COMMITTEE Mard, Christopher J. FILING FREQUENCY: QUARTERLY

PO BOX 40177

WASHINGTON

HON-PARTY NON-QUALIFIED ID #C00423525

DC 20016

	FORM TYPE	RPT TYPE	AI	PGI	REC DATE	PGS	BEG INAGE	COVERA	GE DATES	BEG CASH	RECEIPTS	DISBURSE EX	id Cash De	ETS BY
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NM-OS CONGRESSIONAL VICTORY CONHITTEE Mard, Christopher J. FILING FREQUENCY: QUARTERLY

PO 80X 40177

WASHINGTON

NON-PARTY NON-QUALIFIED ID #C00421638

DC 20016

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IA-01 CONGRESSIONAL VICTORY COMMITTEE Ward, Christopher J. FILING FREQUENCY: QUARTERLY

PO BOX 40177

WASHINGTON

NON-PARTY NON-QUALIFIED ID #C00413013 DC 20018

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DATE 6/05/2008 PAGE 2

IA-01 CONGRESSIONAL VICTORY COMMITTEE

Hard, Christopher J. FILING FREQUENCY: QUARTERLY

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00442

PO BOX 40177

MASHINGTON

NON-PARTY NON-QUALIFIED ID #C00413013

DC 20016

COVERAGE DATES SEG CASH RECEIPTS DISSURSE END CASH DEBTS BY FORM TYPE RPY TYPE AI PGI REC DATE PGS BEG IMAGE 3 YE A P 6/04/2007 6 27990129238 11/28/2008 12/31/2008 74 0 13 61 0

173130 173070 TOTAL

IA-01 Congressional Victory Committee (C00413013) Transfers to Whalen for Congress (C00409573)

Кероп		Fransfer Amount		Transfer Reported by Cambidate Committee?
2006 July Quarterly Report	22	\$36,500.00	6/27/06	Yes
2006 July Quarterly Report	22	\$16,500.00	6/30/06	Yes
2006 October Quarterly Report	22	\$8,700.00	9/8/06	Yes
2006 12 Day Pre-General Report	22	\$89,500.00	10/18/06	Yes
2006 30 Day Post-General Report	22	\$17,800.00	11/7/06	Yes
	Total	\$169,000.00		

Permissible contribution amount: \$2,100.00. Excessive amount: \$166,900.00.

MN-06 Congressional Victory Committee (C00421636)

Transfers to Bachmann for Congress (C00410118)

Report	Report	transfer	Lianstei	Liaustei
	$1~\mathrm{m}_{\odot}$	X111041111	Darte	Reported by
				Candidate.
				Committee?
2006 12 Day Pre-General Report	22	\$115,000.00	10/18/06	Yes
2006 30 Day Post-General Report	22	\$19,000.00	11/6/06	Yes
	Total	\$134,000.00		

Permissible contribution amount: \$2,100.00. Excessive amount: \$131,900.00.

NY-24 Congressional Victory Committee (C00423525)

Transfers to Ray Meier for Congress Committee (C00422220)

Report	Report	transfer	Lianstei	Linustei
	1 1111	Vincarial	Date	Reported by
				Candidate
				Committee
2006 12 Day Pre-General Report	22	\$92,500.00	10/18/06	No
2006 30 Day Post-General Report	22	\$17,000.00	11/6/06	No
	Tetal	\$109,500.00		

Permissible contribution amount: \$2,100.00. Excessive amount: \$107,400.00.